November 29, 2016

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Petition of Metropolitan Telecommunications Holding Company d/b/a "MetTel" for Forbearance Pursuant to 47 U.S.C. § 160(c) from providing broadband internet access service as an offering of the Lifeline program

Dear Ms. Dortch:

MetTel's Petition for Forbearance Pursuant to 47 U.S.C. §160(c) from providing broadband internet access service as an offering of the Lifeline program.

Please contact the undersigned if you have any questions.

Sincerely,
/s/ John Rossi
Regulatory Consultant

cc: telcolifeline@usac.org

In the Matter of	**)**
	)
Petition of Metropolitan Telecommunications	**)**
Holding Company d/b/a "MetTel" for Forbearance	**)** WC Docket No. 11-42
Pursuant to 47 U.S.C. § 160(c) from providing	**)**
broadband internet access service as an offering of	**)**
the Lifeline program	**)**

PETITION FOR FORBEARANCE OF THE METROPOLITAN TELECOMMUNICATIONS HOLDING COMPANY D/B/A "METTEL"

Mr. Sam Vogel
Executive Vice President,
MetTel
55 Water Street / Floor 32
New York, New York 10041

Mr. John Rossi
Regulatory Consultant
MetTel
55 Water Street / Floor 32
New York, New York 10041

Pursuant to Section 10 of the Communications Act of 1934 and Sections 1.53 and 1.54 of the Commission's rules, Metropolitan Telecommunications Holding Company, d/b/a "MetTel", petitions the Commission for forbearance from providing broadband Internet access service (BIAS) as a supported service in the Lifeline program.

In June 2015, the FCC made changes to the Lifeline Program in the *2015 Lifeline Reform Order*. All of the changes from *2015 Lifeline Reform Order* became effective on various dates in 2016. In March of 2016, the FCC made additional changes to the program in the *2016 Lifeline Modernization Order*.

> *"Building on the 2015 Lifeline Reform Order, the 2016 Lifeline Modernization Order establishes a number of additional enhancements to the Lifeline Program, further connecting low-income Americans to voice services and, now, broadband. These changes have been developed to continue the mission of assisting all Americans to get and stay connected in today's technological climate, while at the same time, relieving some of the burden on the carriers providing this service[1]".*

A signature component of the 2016 Lifeline Modernization Order includes provisions for Eligible Telecommunications Carriers (ETCs) to offer eligible low-income subscribers the option of choosing their Lifeline discount (for either their home or mobile phone bill) to be applied to their mobile or fixed broadband instead.

Effective December 2, 2016 Lifeline Program customers will have the choice (where applicable) of applying their benefit to one of three types of service offerings; fixed or mobile broadband, fixed or mobile voice-only or a bundled offer of fixed, or mobile, voice and broadband. In all cases Lifeline subscribers will be permitted only one Lifeline Program benefit, per household.

The 2016 Lifeline Modernization Order provides an ETC – such as MetTel – the option, but not the requirement, of providing BIAS.

[1]http://usac.org/li/tools/rules-orders/2016-lifeline-order.aspx

"We find that it is not necessary to impose an obligation to offer Lifeline-supported BIAS within the Lifeline marketplace for Lifeline-only ETCs and that they should be permitted, but not required, to offer Lifeline-discounted BIAS when such ETCs give notice to the Commission of their intent to limit offerings to voice service[2]".

The 2016 Lifeline Modernization Order establishes the requirement that ETCs desiring Commission approval of this forbearance must formally file a notification with the FCC seeking relief and those areas, by Census block, where the specific forbearance is sought.

MetTel, as an ETC offering Lifeline-only service respectfully submits a request to be granted relief in the Census block areas appearing as Attachment I.

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[2]FCC 16-38, Paragraph 303, Page 111

Attachment I

NYS Census Blocks   https://www.census.gov/geo/maps-data/data/baf.html

BlockAssign_ST36_
NY_SDSEC.txt

BlockAssign_ST36_
NY_SDELM.txt

BlockAssign_ST36_
NY_INCPLACE_CDP.txt

BlockAssign_ST36_
NY_CD.txt

BlockAssign_ST36_
NY_AIANNH.txt

BlockAssign_ST36_
NY_VTD.txt

BlockAssign_ST36_
NY_SLDU.txt

BlockAssign_ST36_
NY_SLDL.txt

BlockAssign_ST36_
NY_SDUNI.txt